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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

RYNE GREEN, an individual,

Defendant.

CASE NO. 2:11-cr-00434-LDG-PAL

DEFENDANT'S UNOPPOSED
MOTION TO MODIFY
CONDITIONS OF RELEASE

COMES NOW Defendant by and through his attorney of record, CRAIG W. DRUMMOND, ESQ., and hereby moves this Honorable Court to modify the Defendant's Conditions of Release to allow travel within the Continental United States.

This motion is made and based on the enclosed affidavit of counsel, Points and Authorities, all pleadings and papers on file herein and any oral argument requested by the Court at the time of hearing.

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I.

STATEMENT OF FACTS

On December 14, 2011 the Defendant appeared before this Honorable Court whereby he was released on an Appearance Bond with conditions. One of the conditions was that travel was limited to Clark County, Nevada. Defendant is hereby requesting to travel within the Continental United States for work related purposes and to visit with family over the holiday time-period. As stated below, on November 2, 2012, CJA defense counsel, Craig W. Drummond, discussed this requested with Mr. Timothy S. Vasquez, AUSA, who related that he did not oppose this request as long as the Defendant was required to continue to inform the U.S. Pretrial Services Office of his whereabouts and reasons for travel. As such, the present Motion is being filed.

II.

**AFFIDAVIT AND DECLARATION OF COUNSEL
IN SUPPORT OF MOTION TO CONTINUE**

STATE OF NEVADA)
) ss:
COUNTY OF CLARK)

CRAIG W. DRUMMOND, ESQ, being first duly sworn, deposes and says:

1. That I am a duly licensed practicing attorney in the State of Nevada, County of Clark, maintaining an office at Craig W. Drummond, P.C., 228 South Fourth St., First Floor, Las Vegas, Nevada 89101, and am the CJA attorney of record for Defendant in the above entitled matter.

2. That on November 2, 2012, I discussed the preparation of the Defendant's present motion and request with Mr. Timothy S. Vasquez, AUSA, allowing the Defendant to travel within the Continental United States for work purposes and to visit with family.

3. That Mr. Vasquez, AUSA, who related that he did not oppose this request as long as the Defendant was required to continue to inform the U.S. Pretrial Services Office of his whereabouts and reasons for travel and would not object to this office filing this matter as "Unopposed."

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4. I sign and declare under penalty of perjury that the above statement is true and correct.

CRAIG W. DRUMMOND, ESQ.
Nevada Bar No. 011109

SUBSCRIBED AND SWORN TO ME

on 9th November, 2012.



Crystal May
NOTARY PUBLIC

III.

CONCLUSION

WHEREFORE, the Defendant requests this Honorable Court modify the Defendant's Conditions of Release to allow travel within the Continental United States, provided that he was required to continue to inform the U.S. Pretrial Services Office of his whereabouts and reasons for travel.

DATED this 9 of November, 2012.

Respectfully Submitted,

ORDER

IT IS SO ORDERED.

DATED this 7 day of February, 2013.

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Sr. U.S. District Judge